

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JAMES J. ANESTIS,

Plaintiff,

-against-

**RULE 26 MEETING
REPORT AND JOINT
DISCOVERY PLAN**

13 CV 7125 (CBA)(LB)

THE CITY OF NEW YORK, POLICE OFFICER
MATTHEW KWIECINSKI, Shield Number 12413, in his
official and individual capacities and SERGEANT
MATTHEW VOGT, Shield Number 5589 in his official
and individual capacities,

Defendants.
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WHEREAS, the parties have conferred pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and the Court's March 18, 2014 Order, and in anticipation of the Initial Pre-Trial Conference scheduled for April 29, 2014 at 2:30 p.m.;

NOW, THEREFORE, the parties respectfully submit the following proposed discovery plan pursuant to Federal Rule of Civil Procedure 26(f)(3):

26(f)(3)(A) The parties will serve their initial disclosures by April 25, 2014.

26(f)(3)(B) The parties require discovery in regard to the incident that forms the basis of plaintiff's claims. The parties anticipate that fact discovery should be completed by **September 12, 2014**. The parties reserve their rights to conduct expert discovery thereafter but do not anticipate any expert discovery at this time.

26(f)(3)(C) At this juncture, the parties do not anticipate conducting discovery of any electronically stored information. The parties do, however, reserve the right to seek discovery of electronically stored information if same becomes necessary during the course of this litigation.

26(f)(3)(D) In the event that plaintiff seeks discovery of employment and/or disciplinary records for any police officer, or other employee of the City of New York, defendants will seek a protective order limiting use of same.

26(f)(3)(E) The parties do not seek an extension to discovery limitations imposed by the Federal Rules of Civil Procedure.

